

October 11, 2021

VIA ECF

The Honorable Jesse M. Furman
 United States District Court
 Southern District of New York
 Thurgood Marshall Courthouse
 40 Foley Square
 New York, New York 10007

Re: *Sjunde AP-Fonden, et al. v. Gen. Elec. Co., et al.*, Case No. 17-cv-8457 (JMF)

Dear Judge Furman:

Pursuant to Rules 1(F) and 3(A) of Your Honor's Individual Rules and Practices in Civil Cases, counsel for Plaintiffs and Defendants write jointly to request a 60-day extension of the fact discovery deadline and all corresponding deadlines set forth in the Civil Case Management Plan and Scheduling Order dated February 26, 2021 ("Scheduling Order") (ECF No. 211).

The parties have conferred and agreed that, in exchange for waiving their right to petition the Court for additional depositions, Plaintiffs may take up to 15 fact witness depositions in this matter. The parties believe that a 60-day extension to the fact discovery deadline will provide sufficient time to schedule and complete 15 fact witness depositions, after taking into consideration witness availability and the upcoming holiday season. As a result, the parties respectfully submit that good cause exists to extend the December 3, 2021 fact discovery deadline, the March 25, 2022 expert discovery deadline, and the pretrial conference currently scheduled for December 8, 2021 by approximately 60 days, as set forth in the chart below. For the avoidance of doubt, all attendant deadlines in the Scheduling Order (including the interim deadlines set forth in Paragraphs 9, 12-16 of the Scheduling Order) shall likewise be extended.

Event	Current Deadline	New [Proposed] Deadline
Completion of Fact Discovery	December 3, 2021	February 1, 2022
Pretrial Conference ¹	December 8, 2021	February 7, 2022 (subject to the Court's availability)
Completion of Expert Discovery	March 25, 2022	May 24, 2022

To date, the parties have requested one extension to a deadline set forth in the Scheduling Order (ECF No. 232), which the Court granted (ECF No. 233). We are available at the Court's convenience to discuss this request.

¹ Pretrial conference deadline pursuant to the Court's order on August 27, 2021 (ECF No. 243).

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Respectfully submitted,

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Application GRANTED. The deadlines for fact and expert discovery in the Case Management Plan, ECF No. 211, are extended as proposed in this letter. The pretrial conference scheduled for December 8, 2021, is hereby ADJOURNED to February 8, 2022 at 3:00 p.m. The Clerk of Court is directed to terminate ECF No. 268. SO ORDERED.



October 12, 2021

² Plaintiffs use electronic signatures with consent in accordance with Rule 8.5(b) of the Court's ECF Rules and Instructions.